

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, <i>ex rel.</i>	:
DILBAGH SINGH, M.D.,	:
PAUL KIRSCH, M.D.,	:
V. RAO NADELLA, M.D., and	:
MARTIN JACOBS, M.D.,	:
	:
Relators,	:
	:
v.	:
	Civil Action No. 04-186E
	:
BRADFORD REGIONAL	:
MEDICAL CENTER,	:
V & S MEDICAL ASSOCIATES, LLC,	:
PETER VACCARO, M.D.,	:
KAMRAN SALEH, M.D.,	:
and DOES I through XX,	:
	:
Defendants.	:
	:

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Defendants, through their undersigned counsel, hereby move that Exhibits 1 through 6 to be appended to their Motion to Compel filed with this Court on September 4, 2007 be entered under seal pursuant to the Court's previous Protective Order Governing Confidentiality of Documents to be Produced and Information Obtained in Discovery (Document 50), in order to allow any party to designate said documents as confidential as permitted by said Protective Order.

Respectfully submitted,

September 4, 2007

/s/ Carl J. Rychcik

Carl J. Rychcik
Pennsylvania ID No. 73754
FOX ROTHSCHILD, LLP
625 Liberty Avenue, 29th Floor
Pittsburgh, PA 15222
Phone: (412) 394-5549
crychcik@foxrothschild.com

Attorneys for Defendants
V&S Medical Associates, LLC
Peter Vaccaro, M.D.
Karman Saleh, M.D.

/s/ Daniel M. Mulholland III

Daniel M. Mulholland III
HORTY, SPRINGER & MATTERN, P.C.
4614 Fifth Avenue
Pittsburgh, PA 15213
412-687-7677 (phone)
412-687-7692 (fax)
dmulholland@hortyspringer.com

Attorney for Defendant
Bradford Regional Medical Center

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he served the following with a copy of the foregoing Motion by e-mail via the Court's ECF system and by first class United States mail, addressed as follows:

Andrew M. Stone
Allegheny Building, Suite 1400
429 Grant Street
Pittsburgh, PA 15219

G. Mark Simpson
Simpson Law Firm, LLC
165 North Main Street
Jonesboro, GA 30236

Paul E. Skirtich
Assistant U.S. Attorney
Western District of Pennsylvania
U.S. Post Office & Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219

This 4th day of September 2007.

/s/ Daniel M. Mulholland III
Daniel M. Mulholland III, Esquire